

## REMARKS

Favorable reconsideration is respectfully requested.

The claims are 1 to 39.

Claims 1 to 39 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Subramanian et al. (U.S. 6,127,089) in view of Zampini et al. (U.S. 6,503,689) and in further view of Schmidt et al. (U.S. 5,310,581).

This rejection is respectfully traversed.

1. The rejection essentially relies on arguments of record but additionally relies on Schmidt, newly cited.
2. As recognized by the Official Action, Schmidt discloses a photocurable composition comprising a carboxylate polymer protected by a sulfonium salt group. The most typical one thereof in Schmidt is the polymer having the recurring unit illustrated in Example 36 of Schmidt.
3. However, the polymer in Example 36 of Schmidt may merely be capable of releasing the sulfonium salt group itself. That is, after releasing the sulfonium group, the polymer loses sulfonium salt group.
4. On the other hand, the resin component of the presently claimed material has a substituent group which is capable of releasing a terminal group to form a sulfonic acid residue. As recited in the present claims and explained in the present specification, the "residue" should be construed as a group that remains as a part of the resin after releasing the terminal group. That is, the resin component of the claimed material retains the sulfonic acid group as a part of the resin even after releasing the terminal group that had protected the sulfonic acid group. The sulfonic acid group becomes an unprotected group of the resin after releasing the terminal group. Schmidt is totally silent and unsuggestive about such a resin.
5. Further, as pointed out in the response to the previous Action, Subramanian and Zampini are also silent about such a resin.
6. As also pointed out in response to the previous Action, the layer made of the claimed material is capable of being washed off together with a patterned photoresist layer by applying a

solution for removing the photoresist layer, which reduces the number of steps for forming the photolithographic products, and eliminating the necessity of an O<sub>2</sub> plasma ashing step for removing the layer that may damage other layers. One skilled in the art could not have arrived at the present invention based on the disclosure of Zampini, Subramanian and Schmidt, since none of them discloses the features explained in above item 4.

For the foregoing reasons, it is apparent that the rejection on prior art is untenable and should be withdrawn.

No further issues remaining, allowance of this application is respectfully requested.

If the Examiner has any comments or proposals for expediting prosecution, please contact undersigned at the telephone number below.

Respectfully submitted,

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